

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
ABILENE DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED
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UNITED STATES OF AMERICA

v.

TANYA REGAN (1)
CHRISTOPHER REGAN (2)

DEPUTY CLERK 

No. 1:19-CR-0021-C
(supersedes indictment filed 2/28/19)

SUPERSEDING INDICTMENT

The Grand Jury Charges:

Count One

Conspiracy to Produce Child Pornography
(Violation of 18 U.S.C. §§ 2251(a) and 2251(e))

Between a date unknown to the Grand Jury that is not later than on or about February 29, 2012, and on or about February 13, 2019, within the Abilene Division, the San Angelo Division, and the Dallas Division of the Northern District of Texas and elsewhere, the defendants, **Christopher James Regan** and **Tanya Marie Regan**, did combine, conspire, confederate, and agree together to knowingly employ, use, persuade, induce, entice, and coerce John Doe #1 and John Doe #2, minors who had not attained the age of 18, to engage in, and to have John Doe #1 and John Doe #2 assist any other person to engage in, sexually explicit conduct for the purpose of producing any visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction will be transported and transmitted using any means and facility of interstate and foreign commerce and mailed, and which visual depiction was actually transported and

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transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and which visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means including by computer.

All in violation of Title 18, United States Code, Section 2251(a) and (e).

Count Two
Production of Child Pornography
(Violation of 18 U.S.C. §§ 2251(a) and 2251(e))

Between on or about February 29, 2012, and on or about November 9, 2018, within the Abilene Division of the Northern District of Texas and elsewhere, the defendants, **Christopher James Regan** and **Tanya Marie Regan**, attempted to and did employ, use, persuade, induce, entice, and coerce a minor to engage in, and have a minor assist any other person to engage in, sexually explicit conduct for the purpose of producing any visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction will be transported and transmitted using any means and facility of interstate and foreign commerce and mailed, and which visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and which visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means including by computer, to wit: conduct memorialized in visual depictions entitled “_DV_0028.mp4,” “_DV_0029.mp4,” “_DV_0030.mp4,” “_DV_0031.mp4,” “_DV_0032.mp4,” and “_DV_0033.mp4,” located on a 4GB SanDisk SD card.

All in violation of Title 18, United States Code, Section 2251(a) and (e).

Count Three
Production of Child Pornography
(Violation of 18 U.S.C. §§ 2251(a) and 2251(e))

Between on or about May 7, 2015, and on or about November 9, 2018, within the Abilene Division of the Northern District of Texas and elsewhere, the defendants, **Christopher James Regan** and **Tanya Marie Regan**, attempted to and did employ, use, persuade, induce, entice, and coerce a minor to engage in, and have a minor assist any other person to engage in, sexually explicit conduct for the purpose of producing any visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction will be transported and transmitted using any means and facility of interstate and foreign commerce and mailed, and which visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and which visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means including by computer, to wit: conduct memorialized in a visual depiction entitled “_DV_0007.mp4,” located on a 4GB SanDisk SD card.

All in violation of Title 18, United States Code, Section 2251(a) and (e).

Count Four
Production of Child Pornography
(Violation of 18 U.S.C. §§ 2251(a) and 2251(e))

Between on or about June 26, 2018, and on or about November 9, 2018, within the Abilene Division and the Dallas Division of the Northern District of Texas and elsewhere, the defendant, **Tanya Marie Regan**, attempted to and did employ, use, persuade, induce, entice, and coerce a minor to engage in, and have a minor assist any other person to engage in, sexually explicit conduct for the purpose of producing any visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction will be transported and transmitted using any means and facility of interstate and foreign commerce and mailed, and which visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and which visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means including by computer, to wit: conduct memorialized in visual depictions located on a silver and black Toshiba laptop, bearing serial number 5E0784565.

All in violation of Title 18, United States Code, Section 2251(a) and (e).

Counts Five through Ten
 Distribution of Child Pornography
 (Violation of 18 U.S.C. §§ 2252A(a)(2) and 2252A(b)(1))

In separate instances on or about the dates listed below, within the Abilene Division of the Northern District of Texas and elsewhere, the defendant, **Christopher James Regan**, attempted to and did knowingly distribute child pornography and material that contains child pornography using any means and facility of interstate and foreign commerce and that has been mailed, and has been shipped and transported in or affecting interstate and foreign commerce by any means, including by computer, to wit: child pornography images distributed through the Google account jennalennon12@gmail.com:

<u>Count</u>	<u>Date</u>	<u>Image</u>
5	September 19, 2018	6046472664266037546_account_id=42.jpg
6	September 19, 2018	7366752010176100136_account_id=42.jpg
7	September 19, 2018	3914844699216076573_account_id=42.jpg
8	September 19, 2018	3300201517394443913_account_id=42.jpg
9	September 20, 2018	7899103383673784136_account_id=42.jpg
10	September 20, 2018	7830257733441774180_account_id=42.jpg

All in violation of Title 18, United States Code, Section 2252A(a)(2) and (b)(1).

Count Eleven

Possession of Prepubescent Child Pornography
(Violation of 18 U.S.C. §§ 2252A(a)(5)(B) and 2252A(b)(2))

Between on or about February 16, 2017, and on or about November 9, 2018, in the Abilene Division of the Northern District of Texas, and elsewhere, **Tanya Marie Regan** and **Christopher James Regan**, defendants, did knowingly possess, and attempt to possess, a 32GB Transcend SD card, containing at least one image of child pornography as defined in 18 U.S.C. § 2256(8)(A) that involved a prepubescent minor, and a minor who had not attained 12 years of age, that has been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that were produced using materials that have been mailed, and shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

Count Twelve
Possession of Child Pornography
(Violation of 18 U.S.C. § 2252A(a)(5)(B))

Between on or about June 27, 2018 , until on or about November 9, 2018, in the Abilene Division of the Northern District of Texas, and elsewhere, **Tanya Marie Regan**, defendant, did knowingly possess, and attempt to possess, a silver and black Toshiba laptop, bearing serial number 5E0784565, containing at least one depiction of child pornography as defined in 18 U.S.C. § 2256(8)(A), that has been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that were produced using materials that have been mailed, and shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B).

Count Thirteen

Destruction, Alteration, or Falsification of Records in Federal Investigations
(Violation of 18 U.S.C. § 1519)

On or about November 10, 2018, in the Abilene Division of the Northern District of Texas, and elsewhere, the defendant, **Christopher James Regan**, did knowingly alter, destroy, mutilate, conceal, cover up, and falsify a record, document, and tangible object with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of the Department of Homeland Security and Homeland Security Investigations, a department and agency of the United States, and in relation to and contemplation of such matter, to wit: an ongoing criminal investigation in the Northern District of Texas.

In violation of Title 18, United States Code, Section 1519.

Count Fourteen
Attempted Obstruction of Justice
(Violation of 18 U.S.C. § 1512(c)(1))

On or about February 23, 2019, within the Fort Worth division of the Northern District of Texas and elsewhere, the defendant, **Christopher James Regan**, attempted to corruptly alter, destroy, mutilate, and conceal electronic devices, including SD cards, with the intent to impair their integrity and availability for use in an official proceeding, to wit: a federal criminal proceeding in the Northern District of Texas.

All in violation of Title 18, United States Code, Section 1512(c)(1).

Forfeiture Notice
(18 U.S.C. § 2253)

Upon conviction of any offense alleged in the Indictment, and pursuant to 18 U.S.C. § 2253(a), defendant **Tanya Regan** and **Christopher Regan** shall forfeit to the United States of America: (a) any visual depiction described in Section 2251, 2252, or 2252A of Chapter 110, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from any offense alleged in the Indictment; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of any offense alleged in Count One or Count Two, and any property traceable to such property.

The above-referenced property subject to forfeiture includes, but is not limited to, the following:

- Moto Cellular telephone bearing serial number ZY2257JXTN, which was seized at the time of the defendants' arrest on February 13, 2019;
 - LG Cellular Telephone bearing serial number 810CYQX0417260, which was seized at the time of the defendants' arrest on February 13, 2019;
- All electronic devices which were seized pursuant to a State Search Warrant out of Howard County on November 9, 2018, including, but not limited to the following:
- A Silver and black Toshiba laptop, bearing serial number 5E078456S;
 - A Dell laptop, bearing serial number 6C4BBL2;
 - A Dell laptop, bearing serial number CJSPPQ2;
 - An HP laptop, bearing serial number 5CD5386N6B;
 - A Samsung Tablet, bearing IMEI 352087093301183;
 - A transcend micro SD card, 32 gigabytes;
 - Samsung Note 9 Cellular telephone, bearing IMEI 356569090673413;
 - Samsung Note 8 Cellular telephone, bearing IMEI 351823090767229;


- Samsung Cellular telephone, bearing IMEI 353425083599789;
- A purple HP laptop, no known serial number;
- A blue HP laptop, bearing serial number 5CD5462148;
- Four miscellaneous flash drives including San Disk, Ryder, and Lexar brands;
- 11 miscellaneous San Disk memory cards;
- Five Brady thumb drives;
- A pink Chrome tablet, four gigabyte, bearing serial number RK2928sdk;
- An iPad, bearing serial number F9FNX04MFPFL;
- An iPad, bearing serial number F9FP60W4FPFL;
- A Samsung tablet, bearing serial number R52GCOJY6RW;
- A Samsung tablet, serial number unknown;
- A silver Samsung Galaxy S4, serial number unknown;
- A Samsung Galaxy Prevail, serial number unknown;
- An Alcatel Cellular telephone; serial number unknown;
- A Motorola Cellular telephone; serial number unknown;
- 8 mm videotapes; and
- Miscellaneous DVDs and CDs containing child pornography.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

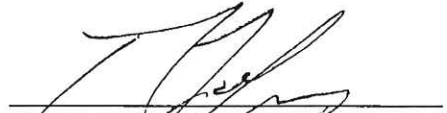
it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b), to seek forfeiture of any other property of the said defendant up to the value of the forfeitable property described above.

A TRUE BILL



FOREPERSON

ERIN NEALY COX
UNITED STATES ATTORNEY


RUSSELL H. LORFING
Assistant United States Attorney
Texas State Bar No. 24070173
1205 Texas Avenue, Suite 700
Lubbock, Texas 79401

Telephone: 806-472-7351

Facsimile: 806-472-7394

E-mail: russell.lorfing@usdoj.gov

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
ABILENE DIVISION

THE UNITED STATES OF AMERICA

v.

TANYA REGAN (1)
CHRISTOPHER REGAN (2)

SUPERSEDING INDICTMENT

- COUNT 1: CONSPIRACY TO PRODUCE CHILD PORNOGRAPHY
Title 18, United States Code, Sections 2251(a) and 2251(e).
- COUNTS 2-4: PRODUCTION OF CHILD PORNOGRAPHY
Title 18, United States Code, Sections 2251(a) and 2251(e).
- COUNTS 5-10: DISTRIBUTION OF CHILD PORNOGRAPHY
Title 18, United States Code, 2252A(a)(2).
- COUNT 11: POSSESSION OF PREPUBESCENT PORNOGRAPHY
Title 18, United States Code, Sections 2252A(a)(5)(B) and
2252A(b)(2)
- COUNT 12: POSSESSION OF CHILD PORNOGRAPHY
Title 18, United States Code, Sections 2252A(a)(5)(B)
- COUNT 13: DESTRUCTION, ALTERATION, OR FALSIFICATION OF
RECORDS IN FEDERAL INVESTIGATIONS
Title 18, United States Code, Section 1519
- COUNT 14: ATTEMPTED OBSTRUCTION OF JUSTICE
Title 18, United States Code, Section 1512(c)(1)

FORFEITURE NOTICE

(14 COUNTS + FORFEITURE)

A true bill rendered,

Lubbock




Foreperson

Filed in open court this 12th day of June, A.D. 2019

Clerk

Defendants are in federal custody (Indictment No. 1:19-CR-0021-C)


UNITED STATES MAGISTRATE JUDGE